

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC., a  
Delaware corporation,

Plaintiff,

v.

FAIRCHILD SEMICONDUCTOR  
INTERNATIONAL, INC., a Delaware  
corporation, and FAIRCHILD  
SEMICONDUCTOR CORPORATION, a  
Delaware corporation,

Defendants.

C.A. No. 04-1371 JJF

**DECLARATION OF SEAN P. HAYES IN SUPPORT OF  
POWER INTEGRATIONS' OPPOSITION TO INTERSIL'S MOTION TO QUASH  
AND MOTION FOR A PROTECTIVE ORDER**

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Attorneys for Plaintiff  
POWER INTEGRATIONS, INC.

Date: June 12, 2006

I, Sean P. Hayes, declare as follows:

1. I am an associate of Fish & Richardson P.C., counsel of record in this action for Plaintiff Power Integrations, Inc. ("Power Integrations"). I am a member of the Bar of the State of Delaware and of this Court. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2. Attached as Exhibit A is a true and correct copy of Fairchild's Complaint against Power Integrations, filed in the Eastern District of Texas on April 11, 2006.

3. Attached as Exhibit B is true and correct copy of a Patent License Agreement dated March 30, 2006, bearing Bates numbers I704-706.

4. Attached as Exhibit C is true and correct copy of Supplemental Agreement dated March 30, 2006, bearing Bates number I703.

5. Attached as Exhibit D is a true and correct copy of Fairchild's Amended Complaint, filed in the Eastern District of Texas on May 19, 2006.

6. Attached as Exhibit E is a true and correct copy of Brian VanderZanden's April 20, 2006 letter to Michael Headley.

7. Attached as Exhibit F is a true and correct copy of Brian VanderZanden's April 24, 2006 letter to Michael Headley.

8. Attached as Exhibit G is a true and correct copy of Michael Headley's April 25, 2006 to Brian VanderZanden.

9. Attached as Exhibit H is a true and correct copy of Michael Headley's April 26, 2006 email to G. Hop Guy.

10. Attached as Exhibit I is a true and correct copy of Michael Headley's May 5, 2006 email to Brian VanderZanden.

11. Despite numerous phone calls to Intersil-Fairchild's counsel, Mike Jones, Power Integrations' local counsel in Texas, could not obtain the Intersil-Fairchild license.

12. Attached as Exhibit J is a true and correct copy of Jeffrey Bragalone's May 19, 2006 letter to Michael Headley.

13. Attached as Exhibit K is a true and correct copy of Jeffrey Bragalone's May 22, 2006 letter to Michael Headley.

14. Attached as Exhibit L is a true and correct copy of Intersil Corporation's Objections and Responses To Subpoena From Power Integrations, Inc.

15. Attached as Exhibit M is a true and correct copy of Ruth Lee's May 26, 2006 letter to Michael Headley enclosing Intersil document production.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 12<sup>th</sup> day of June, 2006, at Wilmington, Delaware.

/s/ Sean P. Hayes  
Sean P. Hayes

**CERTIFICATE OF SERVICE**

I hereby certify that on June 12, 2006, I electronically filed with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following:

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Counterclaimant  
FAIRCHILD SEMICONDUCTOR  
INTERNATIONAL, INC. and  
FAIRCHILD SEMICONDUCTOR  
CORPORATION and INTERSIL  
CORPORATION

I hereby certify that on June 12, 2006, I have mailed by United States Postal Service, the document(s) to the following non-registered participants:

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